



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

*666 OK
10/24/00*

MEMORANDUM

DATE: October 23, 2000

TO : EP

Through: Sadye E. Dunn, Secretary, OS

FROM : Martha A. Kosh, OS

SUBJECT: Petition HP 00-4 by CFA et.al, seeking a Ban of Bath
Bath Seats, FR August 22, 2000, Volume 65, No. 163,
page 50968

ATTACHED ARE COMMENTS ON THE CH 00-6

| <u>COMMENT</u> | <u>DATE</u> | <u>SIGNED BY</u> | <u>AFFILIATION</u> |
|----------------|-----------------------|--|---|
| CH 00-6-1 | 8/07/00 Rec'd 9/21 | Donald L. Mays Technical Director | Good Housekeeping 959 Eight Ave New York, NY 10019 |
| CH 00-6-2 | 9/20/00 | Gloria Garcell Rita Luna Vickie Vakalopoulos Ericka Vargas Mayra Uriza | Florida International University |
| CH 00-6-3 | 10/05/00 | Meg Pearce | 6423 Little Leigh Ct. Cabin John, MD 20818 |
| CH 00-6-4 | 10/05/00 | Brian Pullin | 520 Independence Pkwy Chesapeake, VA 23320 |
| CH 00-6-5 | 10/05/00 | Douglas Perkins | 16629 Lescot Terrace Rockville, MD 20853 |
| CH 00-6-6 | 10/05/00 | Jody Young | 503 Circleview Dr. Atkins, IA 52206 |
| CH 00-6-7 | 10/05/00 | Mark Williams Molly Williams | 503 Green Valley Terrace SE, Cedar Rapids, IA 52403 |
| CH 00-6-8 | 10/05/00 | Toni Johnson | PSC 811 Box 366 FPO AE 09609 |
| CH 00-6-9 | 10/05/00 | Beth Rathbun | 812 7 th St, SW Cedar Rapids, IA 52404 |

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| | | | |
|------------|----------|------------------|--|
| CH 00-6-10 | 10/05/00 | Bryan Kerrigan | 4816 Broom Dr. Olney, MD 20832 |
| CH 00-6-11 | 10/05/00 | Melanne Miller | 1734 Lake Terrace Rd. Cedar Rapids, IA 52403 |
| CH 00-6-12 | 10/05/00 | Martha Behrend | 3574 Plum Dale Dr. Fairfax, VA 22033 |
| CH 00-6-13 | 10/05/00 | Julie Hendricks | <u>julie.hendricks@wcom.com</u> |
| CH 00-6-14 | 10/05/00 | Pamela Smerker | 218 Eagle Ave. Mead, CO 80542 |
| CH 00-6-15 | 10/05/00 | Carol Cannon | 87 - 14 th Ave, SW Cedar Rapids, IA 52404 |
| CH 00-6-16 | 10/05/00 | Patrick Lampe | 1210 Sierra Dr, #10 Cedar Rapids, IA 52402 |
| CH 00-6-17 | 10/06/00 | Vania Wolf | <u>vaniaa@umd5.umd.edu</u> |
| CH 00-6-18 | 10/06/00 | Celteen Barger | 2238 Chandler St, SW Cedar Rapids, IA 52404 |
| CH 00-6-19 | 10/06/00 | Valerie Anderson | 5849 Ridgeview Dr, SW Cedar Rapids, IA 52404 |
| CH 00-6-20 | 10/06/00 | Brenda Cooley | 1518 N Avenue, NW Cedar Rapids, IA 52404 |
| CH 00-6-21 | 10/06/00 | Rachel Rock | 86 Hawthorn Ave Needham, MA 02492 |
| CH 00-6-22 | 10/06/00 | Jena Jacobi | 510 Circleview Dr. Atkins, IA 52206 |
| CH 00-6-23 | 10/06/00 | Carol Danek | 718 Fernwood Dr., NE Cedar Rapids, IA 52402 |
| CH 00-6-24 | 10/07/00 | Laura Rodriguez | 10 Cherry Acres Dr. Hampton, VA 23669 |
| CH 00-6-25 | 10/09/00 | Lisa Cooley | 4201 33 rd Ave., SW Cedar Rapids, IA 52404 |
| CH 00-6-26 | 10/09/00 | Cristina Hurley | 7272 19 Avenue Van Horne, IA 52346 |
| CH 00-6-27 | 10/10/00 | M. Dhanushkodi | 4001 South Watt Ave. Apt. 210 Sacramento, Ca 95826 |

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|------------|----------|------------------------------|--|
| CH 00-6-28 | 10/10/00 | Dixie Derby | 1616 B Avenue, NE Cedar Rapids, IA 52402 |
| CH 00-6-29 | 10/11/00 | Suzanne Barloon | 711 Grant Street Walker, IA 52352 |
| CH 00-6-30 | 10/11/00 | James Barger | 2238 Chandler St, SW Cedar Rapids, IA 52404 |
| CH 00-6-31 | 10/11/00 | Kelly Collins | 1706 Hamer Dr., NW Cedar Rapids, IA 52404 |
| CH 00-6-32 | 10/12/00 | Kelly Sweet | 1000 E Avenue, NW Cedar Rapids, IA 52404 |
| CH 00-6-33 | 10/12/00 | Steven Moshier | 1835 39 th Street Cedar Rapids, IA 52405 |
| CH 00-6-34 | 10/12/00 | Debra Lewis | 1609 Richmond Rd, NE Cedar Rapids, IA 52402 |
| CH 00-6-35 | 10/13/00 | Maureen Foster | mfoster@gfsd.org |
| CH 00-6-36 | 10/13/00 | Marge Bann | 7300 42 nd St, NE Cedar Rapids, IA 52411 |
| CH 00-6-37 | 10/13/00 | Jack Barnes | 102 Johnson St, W Norway, IA 52318 |
| CH 00-6-38 | 10/13/00 | Joy Douglas | 2650 27 th Ave. Marion, IA 52302 |
| CH 00-6-39 | 10/13/00 | Tanya McCarthy | 3037 Circle Dr, NE Cedar Rapids, IA 52402 |
| CH 00-6-40 | 10/14/00 | Margie Cowan | 11851 Dunlop Court Reston, VA 20191 |
| CH 00-6-41 | 10/16/00 | Karen Bading | 818 Oakland Rd, NE Cedar Rapids, IA 52404 |
| CH 00-6-42 | 10/16/00 | John Mosinski | 3037 Circle Dr, NE Cedar Rapids, IA 52402 |
| CH 00-6-43 | 10/16/00 | Jodi Custer | 1039 32 nd St, NE Cedar Rapids, IA 52402 |
| CH 00-6-44 | 10/16/00 | C. Echternacht | 8746 Flamingo Dr. Chanhassen, MN 55317 |
| CH 00-6-45 | 10/16/00 | Bob Barger Brender Barger | 3110 Southland St. Cedar Rapids, Ia 52742 |
| CH 00-6-46 | 10/16/00 | Robin Pospisil | 51 Butcher Road Martelle, IA 52305 |

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| | | | |
|------------|----------|--|--|
| CH 00-6-47 | 10/16/00 | Becky Cooper | 7201 Marywood Circle Austin, TX 78723 |
| CH 00-6-48 | 10/17/00 | Jason Knapp | 1050 Grand Ave., #6 Marion, IA 52302 |
| CH 00-6-49 | 10/17/00 | Erica Cesari | 1280 Larpenateur Ave, W #307 St. Paul, MN 55113 |
| CH 00-6-50 | 10/17/00 | Cathy Barber | 100 Mayflower Hall #702A Iowa City, IA 52242 |
| CH 00-6-51 | 10/17/00 | Erin Penne | 6222 Rockwell Dr, NE #203 Cedar Rapids, IA 52402 |
| CH 00-6-52 | 10/18/00 | K. King-Hoffman | 1114 15 th Ave, SW Cedar Rapids, IA 52404 |
| CH 00-6-53 | 10/19/00 | Travis Letellier <u>travisletellier@hotmail.com</u> | |
| CH 00-6-54 | 10/20/00 | Marla Felcher | 325 Harvard St. Cambridge, MA 02139 |
| CH 00-6-55 | 10/20/00 | Sue Fuller | 1841 County Home Rd Marion, IA 52302 |
| CH 00-6-56 | 10/23/00 | Heather Paul Exe. Director | National Safe Kids Campaign 1301 Pennsylvania Ave,NW Suite 1000 Washington, DC 20004 |
| CH 00-6-57 | 10/23/00 | LaDawn Smith | 1400 2 nd Ave, SE, #103 Cedar Rapids, IA 52403 |
| CH 00-6-58 | 10/23/00 | S. Vozenilek | 2418 9 th Ave., SW Cedar Rapids, IA 52404 |
| CH 00-6-59 | 10/23/00 | Florida Univ. Students | Florida International University |
| CH 00-6-60 | 10/23/00 | Mary E. Fise on Behalf of State & Local Consumer Organizations | Consumer Federation of America |

| | | | |
|------------|----------|--|---|
| CH 00-6-61 | 10/23/00 | Frances Smith Exec. Director | Consumer Alert 1001 Connecticut Ave, NW Suite 1128 Washington, DC 20036 |
| CH 00-6-62 | 10/23/00 | Beth Vozenilek | 1194 Linn Ridge Rd. Mt. Vernon, IA 52314 |
| CH 00-6-63 | 10/23/00 | F. Locker Atty, Counsel to Juvenile Products Manf. Assoc., Inc. | Locker Greenberg & Brainin, P.C. 420 5 th Ave, 26 th Fl New York, NY 10018 |
| CH 00-6-64 | 10/25/00 | S. Carballo Student | 10725 SW 3 rd St, Apt #2 Miami, FL 33174 |
| CH 00-6-65 | 10/24/00 | Mary Biggart | <u>squirtus@netins.net</u> |

Good Housekeeping

959 EIGHTH AVENUE, NEW YORK, NY 10019 * 212-649-2390 * FAX 212-489-8139

2410-67

RECEIVED BY THE SECRETARY

2000 AUG 10 A 11:41

DONALD L. MAYS
TECHNICAL DIRECTOR
THE GOOD HOUSEKEEPING INSTITUTE

Ms. Sadye Dunn, Secretary
US Consumer Products Safety Commission
4330 East-West Highway
Suite 502
Bethesda, MD 20814

Dear Ms. Dunn:

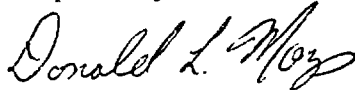
Good Housekeeping magazine and it's Good Housekeeping Institute have been investigating and reporting on consumer product safety issues for the past 100 years, and have played a significant role in the development of safety standards for toys and other children's products.

Today, I am writing in support of the petition filed on July 25, 2000 to ban baby bath seats. We strongly agree with the petitioners, Consumer Federation of America, The Drowning Foundation, et. al., that baby bath seats pose an unreasonable risk of injury and death to children. We support their petition that requests that bath seats be banned as hazardous products.

Our independent review of baby bath seats concluded with the Good Housekeeping Institute publicly recommending against the sale and use of these products. We stated in both print and on TV that bath seats can give parents a false sense of security, which often has tragic consequences. In our technical opinion, there is simply no way to make these products safe.

Thank you for your consideration of our views on this important matter.

Respectfully submitted,



Donald L. Mays
Technical Director,
Good Housekeeping Institute

Cc: Chairman Ann Brown
Commissioner Mary Sheila Gall
Commissioner Thomas Hill Moore



*Baby Bath Seats
Comments*

OFFICE OF THE SECRETARY
FEBRUARY
2000 SEP 21 P 2:11
40

September 20, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington DC 20207

Office of the Secretary
Room 501
4330 East-West Highway
Bethesda, Maryland 20814

Re: Docket# HP 00-4 "Petition to Ban Bath Seats"

To Whom It May Concern:

In June of 1994, the U.S. Consumer Product Safety Commission voted (2-1) against initiating formal rulemaking proceedings on baby bath seats, which at the time were associated with 14 deaths and 7 near drownings since 1983. At the time the Commission believed that under the Federal Hazardous Substance Act, the design and manufacture of these products did not present a mechanical hazard or an unreasonable risk of injury to consumers.

The commission also voted (2-1) to work with industry to initiate a public information campaign focusing on the risks taken by parents and other caregivers who leave children unattended in bathtubs. Some of the commissioners involved in the decision making at the time stated that the primary cause of the deaths was the irresponsible actions of those entrusted with caring for the children and that those actions had caused the deaths. Chairman Ann Brown, who voted in favor of the rulemaking, expressed her disappointment with the decision, which in her opinion encouraged dangerous consumer behavior by instilling a false sense of security in a parent who would normally never leave a baby alone in water. She said that the baby bath seats possess the hidden hazard of convincing the user that the product creates a safer environment for a baby. And, the sturdier, more durable-looking the seat, the more likely the consumer is to leave the baby unattended for a moment.

As a result the CPSC urged parents and caregivers who were using the baby bath seats to:

- Never leave a baby alone in the water for even a second. Keep baby in arms reach.
- Never use the baby bath seat in a non-skid, slip-resistant bathtub
- Check to see that the suction cups are securely attached to the bath seat and tub surface

These recommendations although beneficial have not helped the situation. Since then, the number of children's deaths associated with the product has increased, 66 incidents of drowning and 37 reports of near drowning involving baby bath seats have been identified.

On August 22, 2000, a notice of a petition appeared in the Federal Register (Volume 65, Number 163), a new petition brought by the Consumer Federation of America (CFA), the nation's largest consumer advocacy organization representing over 260 state, local and national consumer organizations and over 50 million consumers, along with eight other organizations dedicated to the prevention of injuries to infants and young children.

The intent of Petition HP-004 is that the Consumer Product Safety Commission ban baby bath seats under Section 3 (e) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. section 1262, finding that baby bath seats intended for use by children present a mechanical hazard and, therefore, pursuant to section 2 (f) (1) (D) of the FHSA, 15 U.S.C. section 1261, are hazardous substances and accordingly, pursuant to section 2 (q) (1) (A) of the FHSA, 15, these baby bath seats are to be considered banned hazardous substances. Specifically, the Petitioners request that CPSP issue a rule that states:

Under the authority of section 2 (f) (1) (D) of Federal Hazardous Substances Act and pursuant to provisions of section 3 (e) of the act, the Commission has determined that baby bath seats (including bath rings) intended for use by children present a mechanical hazard within the meaning of section 2 (e) of the Act because in normal use, or when subject to reasonably foreseeable damage, or abuse, the design or manufacture presents an unreasonable risk of personal injury or illness, and therefore are banned under section 2 (q) (1) (A) of the Act.

After reviewing the history behind the petition, and considering the fact that there have been over four times more children's deaths as a result of being left alone in the water, we feel it is time to address the hidden hazard the baby bath seats and rings represent by giving parents and caregivers a false sense of security which in turn leads to increased risk-taking behaviors among those using the product. (1)

Based on the study conducted at the University of Utah, parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caregivers not using the baby bath seats. Those using the baby bath seats prepare baths with deeper water and are more likely to leave a child unattended in the bath for conscious, willful reasons (for example to perform other household activities). The fact that the bath seats

provide a mechanical aid to hold a slippery baby upright gives the caregiver the idea that the child could be left alone for just a minute.

We feel that the depth of the water and the fact that the child is left alone increase the chances for drowning. Most caregivers believe that they would be able to hear the cries of a child in distress or the splashing of the water, when in reality for infants and toddlers, water in the airway blocks any effective sound from the being heard and can cause tracheal constriction which fully blocks the airway and incapacitates the child. It only takes moments for brain damage to occur. Death follows after 4-5 minutes.

We understand that there have been voluntary standards established for the product. But we also realize that ASTM Voluntary Standard, Infant Bath Seats, F 1967-99 does not address the size of leg opening, which can cause the child to slip out of the seat, it does not address the efficacy of the suction cups, and the fact that the warning about not using the product in a slip resistant surface, which reduces the suction capacity of the cups, is on the package and not in the product itself. The standard also fails to address the manufacturer's refusal to provide a water depth line to guide the consumer to reduce the likelihood of filling the bath with more water than needed. In other words the voluntary standard does not provide the needed guidelines for improved product safety.

There is also the problem with the ASTM Voluntary Standard for Slip-Resistant Bathing Facilities, F 462-79 that was re-approved in 1994. This standard provides for all new homes and homes with remodeled baths with slip resistant feature in the bathtub basin. We agree that this standard, while reducing fall injuries in bathrooms for the general population, makes for a lethal combination when baby bath seats are used in those bathtubs.

After conducting interviews of 8 parents and caregivers we found that they all had either bought the product or received it as a gift. When asked about the usage of the baby bath 7 out of 8 caregivers said they did not use the product because it did not seem safe to them. Only one parent said that she liked the product because it was practical and easy to use.

We also interviewed two pediatricians, and they both recommended the products but insisted that parents should not trust the safety of the children to a marketed product design to assist in the bathing of the child. They themselves are parents and did not use the product, considering it unsafe.

We also interviewed two manufacturers of the product:

Safety 1st: Spoke with the customer relation's manager

They are aware of the petition.

They stated that the commission thinks their product is safe as long as parent use it properly. They feel the product is a practical tool for mothers and it was designed to assist caregivers while bathing the children.

They don't feel the product will be banned or taken out of the market.

The First Years: Spoke with the consumer product manager

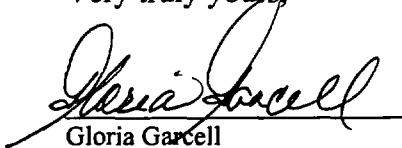
They also were aware of the petition.

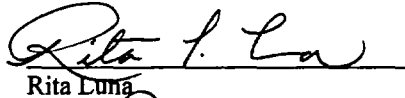
When asked if they were aware of the petition, they said yes and also stated that they believe their product is safe and that they keep selling it without problems. They are aware of fatal incidents that occurred and they are sorry. However they feel confident about their product and are not considering removing it from the market. They also said that their product should be used under adult supervision only and that children should not be left alone under any circumstances because unfortunately this is when accidents happen.

After taking into consideration all the interviews, the research provided, and the history behind this issue, we would like to express our support for the proposed rule to ban baby bath seats. We hope that the commission re-examines the evidence and rules in favor of rulemaking that will at last take the product off the market. We hope that no more children will die before the commission realizes that even though the product may not prove to be mechanically dangerous, there is an inherent hazard in its use.

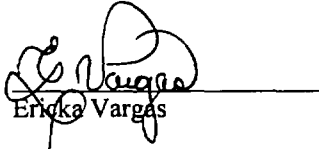
We hope you find these comments useful.

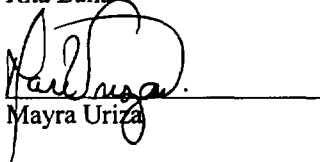
Very truly yours,


Gloria Garcell


Rita Luna


Vickie Vakalopoulos


Ericka Vargas


Mayra Uriza

9/21/00

Date

Enclosures

- (1) These comments represent the views of a group of students at the school of Business at Florida International University enrolled in a Business in Society course.

September 10, 2000

Mom's Name: Maria Zamora

Child's Name: Carlos Zamora

Age: 1 year

Q: Who takes care of the child?

A: The aunt

Q: How did you get the product?

A: Got it as a gift

Q: What is the Brand Name of the Product?

A: Baby Bath Ring-Safety 1st Inc.

Q: When did you start using this product?

A: When the baby was 6 months old

Q: Does the mother plan to use it often?

A: A few times

Q: Does she like using the product?

A: Not really

Q: Why does she like or dislike the product?

A: She uses the product only when she wants to play with the baby in the water. She does not like the product enough to use it every day.

September 15, 2000

Mom's Name: Leanne Lozano

Child's Name: Amanda Lozano

Age: 3 Months

Q: Who takes care of the child?

A: Mother in Law

Q: How did you get the product?

A: Passed on from sister in Law

Q: What is the Brand Name of the Product?

A Baby Bath Ring-Safety 1st Inc.

Q When did you start using this product?

A Not yet

Q Does the mother plan to use it often?

A: No

Q Does she like using the product?

A No

Q: Why does she like or dislike the product?

A: She does not feel safe using it yet. The baby is still too small and can not support herself. If and when she decides to use it, she says she will be very careful, due to the safety concerns she has heard regarding the product.

September 11, 2000

Mom's Name: Stacy Infante

Child's Name: Eric Infante

Age: 8 Months

Q: Who takes care of the child?

A: Grandmother

Q: How did you get the product?

A: Given at a Baby Shower

Q: What is the Brand Name of the Product?

A Deluxe Bath Ring-Sanitary, Inc.

Q When did you start using this product?

A About 2 months ago

Q Does the mother plan to use it often?

A: Yes, when she has time and when someone else is home with her while she bathes the baby

Q Does she like using the product?

A Have mixed feelings about it

Q: Why does she like or dislike the product?

A: The product provides assistance holding the baby while she gives him a bath. It is also helpful when she wants to allow the baby to play in the water, but she realizes that she can not leave the baby alone because the product does not provide safety for the baby, it is only convenience for the person handling the child.

September 14, 2000

Mom's Name: Patricia Flores

Child's Name: Kendrick Vargas

Age: 1 year 10 months

Q: Who takes care of the child?

A: The mother

Q: How did you get the product?

A: The father bought it

Q: What is the Brand Name of the Product?

A: Deluxe Bath Ring-Sanitary, Inc.

Q: When did you start using this product?

A: When the baby was 10 months old

Q: Does the mother plan to use it often?

A: She used it once

Q: Does she like using the product?

A: No

Q: Why does she like or dislike the product?

A: She does not like the product because she tried it once and the baby got hurt. He was playing with the water and he turned around and hit himself with the tub.

September 14, 2000

Mom's Name: Carolina Rivas

Child's Name: Austin Ramirez

Age: 11 months

Q: Who takes care of the child?

A: The babysitter

Q: How did you get the product?

A: The father bought it

Q: What is the Brand Name of the Product?

A Swivel Bath Seat-Safety 1st Inc.

Q When did you start using this product?

A After 6 months

Q Does the mother plan to use it often?

A: Every day

Q Does she like using the product?

A Yes

Q: Why does she like or dislike the product?

A: She likes this product because it is practical and easy to use.

September 10, 2000

Mom's Name: Nurkia Altamirano

Child's Name: Cristian Altamirano

Age: 1 year 6 months

Q: Who takes care of the child?

A: The mother

Q: How did you get the product?

A: Got it as a gift

Q: What is the Brand Name of the Product?

A: Swivel Bath Seat-Safety 1st Inc.

Q: When did you start using this product?

A: Never used it

Q: Does the mother plan to use it often?

A: No

Q: Does she like using the product?

A: No

Q: Why does she like or dislike the product?

A: Never used it and does not plan to use it, the product seems unsafe

September 10, 2000

Mom's Name: Eve Esquivel

Child's Name: Nataniel Esquivel

Age: 1 year 6 months

Q: Who takes care of the child?

A: The mother

Q: How did you get the product?

A: Got it as a gift

Q: What is the Brand Name of the Product?

A 2 IN 1 Bath Tub & bath Seat- The First Years

Q When did you start using this product?

A Never used it

Q Does the mother plan to use it often?

A: No

Q Does she like using the product?

A No

Q: Why does she like or dislike the product?

A: Never used it and does not plan to use it, the product is very uncomfortable for her back and she does not trust this type of product

September 10, 2000

Mom's Name: Evelyn Rua

Child's Name: Joselyn Rua

Age: 8 months

Q: Who takes care of the child?

A: The grandmother

Q: How did you get the product?

A: Got it as a gift

Q: What is the Brand Name of the Product?

A Baby Bath Ring-Safety 1st Inc.

Q When did you start using this product?

A When the baby was 7 months old

Q Does the mother plan to use it often?

A: She uses the product 3 times a week

Q Does she like using the product?

A No

Q: Why does she like or dislike the product?

A: She does not like the product because it does not stick to the bathtub. The pressure of the water can move the baby seat and it can turn it over. If the baby wants to reach something (for example a toy), the seat may turn over increasing the risk for an accident

Interviews

Safety 1st :

Are you aware of a petition requesting that the commission issue a rule banning baby bath seats and bath rings?

A= yes

What do you think about it?

A= We think our product is safe, therefore we are not going to take it out of the market. The commission thinks this product is a safe item as long as parents use them right. Unfortunately, all the incidents that had happened is when parents were not Supervising their children. I myself had use this product without any problem Because I'm a responsible mother and I won't leave my child alone. This product is A mother tool: It's design to help parents while they are bathing their kids.

What's your name?

Cindy

What is your position in this company?

I'm a customer relation manager.

The First Years

1- Are you aware of a petition requesting that the commission issue a rule banning baby bath seats and bath rings?

Yes.

2- What do you think about it?

We believe our products are safe as a result we keep selling them without problem. We are aware of fatal incidents that had occurred and we are sorry. However, we feel confident about this product and we are not even thinking about removing it from the market. This product should be use under parents supervision only. Children should not be left alone under any circumstances because unfortunately this is when accidents happen.

3- What's your name?

Judy Parlor

4- What's your position in this industry?

Consumer product manager.

Baby Bath Seats and Bath Rings

1- Product

Swivel bath seat

- Turns a full 360 degrees
- Unique turn and lock design
- For ages 6 months and older

*** **WARNING:** Prevent drowning. Always keep baby within arm's reach.
Not for use on textured non-skid surfaces.

- U.S. patent Nos. 5,010, 606 & 5,158, 460.
- Style Number: 00160 A
- Product Number: 0 5218100160 4
- S Number: 313351

Addresses:

- 1- Safety 1st Inc., 45 Dan Road, Canton, Ma 02021 USA.
- 2- Safety 1st Canada. Inc., 804 rue Deslauriers, Ville st. Laurent, Quebec H4n 1x 1 Canada.
- 3- Safety 1st Europe Ltd, Isopad House, Shenley Road, Borehamwood, Hertfordshire WD6 1 TE, England.

Consumer relations number: (800) 723-3065

2- Baby Bath Ring

- For ages 6 months and older
- Spinning play bead
- Suction base for added security

Brand: Safety 1st

Product Number: 0 52181 4160 1
Style Number: 41601 A
S Number: 694673

Addresses:

- 1- Safety 1st, Inc., 210 Boylston street, Chestnut Hill, Ma 02167 USA.
- 2- Safety 1st Europe, Ltd, Isopad House, Shenley Road, borehamwood, Hertfordshire WD6 1 TE, England.

Customer Service phone number: (800) 723-3065

3) 2 – IN-1 bathtub & bath seat

*Tub converts easily to bath seat

1- Bathtub

- Full-size infant tub
- Mildew resistant foam pad for comfort
- Conto used to prevent sliding
- Suitable water depth for through bathing

Bath seat:

-
- conversion to bath seat
- T- bar restraint keeps infant in place
- Large suction cups for bathing fun.

Brand: The First Years

Addresses:

- 1- U.S.A./Canada: The First Years Inc., Avon, Ma 02322-1171, U.S.
- 2- Europe: The First Years Inc.,
The old police station, castle street, Cirencester, glos. GL 7 1QU,
United Kingdom.

Customer Service Numbers:

U.S.A./ Canada: 1(800) 533-6708
Europe : 0(800) 526-829

Product Number: 0 71463 03129 0

Style Number: 792101

* Ideas inspired by parents. These products are inspired and pretested by parents, for parents. They are designed in consultation with Dr. T. Berry Brazelton, Dr. Edward Tronick and staff members of the child development unit, Children's Hospital in Boston, U.S.A. The first years is a benefactor of the child development unit.

4) Deluxe bath ring

Nursery needs is a trademark of Sanitoy, Inc., Fitchburg, Ma 01420
For ages 6 months and older

U.S. Patent number: 288, 118

Product Number: 0 74269 01566
Style Number: 1566J

Customer Service Number: (978) 345-7571

Pediatrician's Interviews

Dr. Esteban Geano, MD
11338 SW 184th Street
Miami, Florida 33157
(305) 278-8603

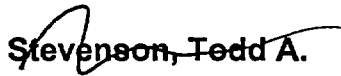
Doctor Genao stated that he has not received any reports from parents or caregivers who have experienced incidents while using the baby bath seats or rings. Nevertheless, he does not recommend the product and is against the use of such devices that he considers unsafe because of the false sense of security it represents. He supports the petition to remove the devices from the market.

Dr. Jose Gomez-Rivera, MD
8366 S.W. 40th Street
Miami, Florida 33155
(305) 553-4233

Doctor Rivera does not recommend the use of the baby bath seat. He is a parent himself and does not feel safe using the baby bath seat. He has not treated any cases of injuries related to the product. He supports the petition to ban baby bath seats.

Doctor Angel F. San Roman, MD
400 University Drive
Coral Gables, Florida 33134
(305) 663-2845

Doctor San Roman stated that while he is aware that several of this patient's parents use such devices, he has not received any reports from the parents in regards to the safety of the product. He said he is familiar with the product and understands the concerns that the use of such product could result in a false sense of security for the users. When asked whether he supported the petition for the banning of baby bath seats, Dr. San Roman stated that minimally there should be clear instructions and warning labels on the product itself to alert parents and caregivers of the harmful situation that may arise while using this product. He said he would not recommend it to any parent who feels there is the slightest possibility that their attention could be drawn away from the infant while bathing.

Stevenson, Todd A.

From: Meg Pearce [Meg.Pearce@wcom.com]
Sent: Thursday, October 05, 2000 12:00 PM
To: cpsc-os@cpsc.gov
Subject: Baby Seat Ban

October 04, 2000
Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby
Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163,
page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months.

Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use.

In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product. Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Meg Pearce
6413 Little Leigh Court
Cabin John, MD 20818
301-320-3475

10/6/00

Stevenson, Todd A.

*Baby bath
seats*
4

From: Brian Pullin [brian.pullin@wcom.com]
Sent: Thursday, October 05, 2000 11:42 AM
To: cpsc-os@cpsc.gov
Subject: 'Petition HP 00-4, Petition to Ban Bath

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby
Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163,
page 50968)

The undersigned citizen strongly urges you to grant the petition
of the Consumer Federation of America et. al. to ban
baby bath seats. We are alarmed at the high incidence of babies
drowning in this product and believe it poses an unreasonable risk of
injury and death to children. At least 66 children have died when using
this product and an additional 37 were involved in near drownings
involving bath seats. Already in the first six months of this year at
least five babies have died.

Bath seats have a very short useful life. They are not recommended for
use until six months of age, when most infants can sit securely. Once
an infant can pull up (generally between seven and nine months) or
attempt to stand while holding onto objects, infant bath seats should be
discontinued, thus limiting its useful life to approximately two
months. Recent research has found that parents and caregivers of
infants
that use baby bath seats engage in more risk taking behavior than
parents and caretakers not using bath seats. Parents and caregivers may
see this product as a safety device and thereby have a false sense of
security with respect to its use. In addition, bath seats are
incompatible with bathtubs meeting the current voluntary standard for
bathtub slip resistance. For these reasons and the growing number of
drowning
deaths, we believe there is substantial evidence supporting a ban of
this product.

Please vote to grant the petition of CFA and the other petitioning
organizations. Thank you.

Sincerely,

Brian Pullin
520 Independence Parkway
Chesapeake Va. 23320
Office (757) 549-5412
Vnet 271-5412
Fax (757) 382-4314

Baby bath seats
5
Stevenson, Todd A.

From: Doug Perkins [doug@oceansystems.com]
Sent: Thursday, October 05, 2000 12:21 PM
To: cpsc-os@cpsc.gov
Subject: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Ba by
October 04, 2000

Office of the Secretary

Consumer Product Safety Commission

Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby

**Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163,
page 50968)**

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drowning involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Douglas R. Perkins

16629 Lescot Terrace

Rockville, MD 20853

301-578080

10/6/00


Stevenson, Todd A.

Baby Bath Seats
6

From: Jody Young [jody.young@wcom.com]
Sent: Thursday, October 05, 2000 1:13 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Jody Young
503 Circleview Drive Atkins, IA 52206
319-446-7873

Baby Bath Seats
Stevenson, Todd A.

7

From: Molly Williams [Molly.Williams@wcom.com]
Sent: Thursday, October 05, 2000 11:01 AM
To: cpssc-os@cpssc.gov
Cc: Mark Williams
Subject: Please Ban Current Baby Bath Seats

October 05, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizens strongly urge you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Mark and Molly Williams
503 Green Valley Terrace SE
Cedar Rapids, IA 52403
319.365.2374

Stevenson, Todd A.

Baby Bath Seats 8

From: william johnson [samntoni@tiscalinet.it]
Sent: Thursday, October 05, 2000 12:57 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath

October 05, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Toni K. Johnson
PSC 811 Box 366
FPO AE 09609

Phone 011-39-0771-371-006 (Italy)

10/5/00

Stevenson/Todd A.

*3/19 f + h
5/2/00*

9

From: Beth Rathbun [beth.rathbun@wcom.com]
Sent: Thursday, October 05, 2000 8:29 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath

October 05, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Beth Rathbun
812 7th Street SW
Cedar Rapids, IA 52404

Stevenson, Todd A.

10

From: Bryan Kerrigan [Bryan.R.Kerrigan@wcom.com]
Sent: Thursday, October 05, 2000 11:19 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath

Importance: High

October 05, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats.

Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Bryan R. Kerrigan
4816 Broom Drive
Olney, MD 20832
301-260-0789


Stevenson, Todd A.

Infant bath seat 11

From: Melanne Miller [Melanne.Miller@wcom.com]
Sent: Thursday, October 05, 2000 1:33 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Melanne Miller
1734 Lake Terrace Road
Cedar Rapids, IA 52403
(319)365-1490

Stevenson, Todd A.

Bath Seats 12

From: Martha Hansen Behrend [Martha.Behrend@wcom.com]
Sent: Thursday, October 05, 2000 1:16 PM
To: cpsc-os@cpsc.gov
Subject: Baby Bath Seat petition

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Martha Behrend
3574 Plum Dale Drive
Fairfax, VA 22033
(703) 709-7972

Baby Bath Seats

13

Stevenson, Todd A.

From: Julie Hendricks [julie.hendricks@wcom.com]
Sent: Thursday, October 05, 2000 1:34 PM
To: cpsc-os@cpsc.gov
Subject: Comments on Petition (HP 00-4) by CFA

Please ban all Baby Bath Seats!!!

Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats
Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

After hearing of an infant, a co-workers granddaughter, nearly drowning because of a baby bath seat I wanted to express my thoughts on why baby bath seats should be banned.

I currently have two children, expecting our third, and I will not use the assistance of a baby bath seat. I did have one for our first child and found it quite hard at times removing the child from the seat after his bath. I did not use that seat much during our first and never with our second. I do believe a infant/small child should never left alone while in water, until this day I will still check on my 7 year old at times while he is in the tub just so I know he is ok. I can very well see how easy it would be for a child to slip down into the water and be very hard at times as a parent to remove him/her from the seat in an emergency. An experience mother may not use this product but a new mother may think it's neat not knowing of the danger it can and has cause. No so called safety feature should be the cause of so many baby deaths.

Please vote YES to ban the making/selling of Baby Bath Seats!!

Stevenson, Todd A:

From: Pamela Smerker [pam@steaksandwich.com]

Sent: Thursday, October 05, 2000 5:13 PM

To: cpssc-os@cpssc.gov

Subject: seeking ban on baby bath seats

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition

of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants

that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Pamela Smerker

218 Eagle Avenue, Mead, Co, 80542

970-535-4776

10/6/00

Stevenson, Todd A.

*Carol Cannon
Seals* 15

From: Carol Cannon [Carol.Cannon@wcom.com]
Sent: Thursday, October 05, 2000 12:40 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

October 05, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Carol L. Cannon
87 - 14th Avenue S. W.
Cedar Rapids, IA 52404-5902
1-319-286-8088

Stevenson, Todd A.

From: Patrick Lampe [patrick.lampe@wcom.com]
Sent: Thursday, October 05, 2000 10:48 AM
To: cpsc-os@cpsc.gov
Cc: Beth Vozenilek; Goldad@consumer.org; Greesa@consumer.org; Goldad@consumer.org; shecje@consumer.org
Subject: FW: Petition to ban Baby bath seats

I received the letter below from one of my co-workers and was shocked and disheartened by its message. I didn't know the exact details of her granddaughter's death, nor did I ask, for obvious reasons, but having infant nieces and nephews and seeing the joy they bring my brothers, their families, and their grandmother (my mom) I knew she must have been in a world of pain. I know too that she must have been quite angry to learn that a product that had years earlier gone to a vote to have banned from store shelves because of it's contribution to the deaths of a number of infants in similar circumstances had been allowed to continue to be sold.

The most difficult part of the letter to accept is the idea that this product could have been removed from the market in 1994 after 14 infant deaths but the CPSC considered this issue and decided in a 2-1 vote not to take action. Could you tell me how such a far reaching decision could be based solely on the vote of 3 people? This is far too much responsibility to be placed on such a small number of decision makers. And while on the subject of responsibility, I would think that they (the 2) would feel at least partially responsible for the 51 infant deaths which have occurred SINCE the erroneous vote in 1994. I'm not sure how they can justify or minimize their impact enough to give them peace of mind. Granted, no infant should be left alone in a bath tub for any period of time and I'm sure that that was the argument heard by the CPSC from the producers of the baby bath seat in 1994. I'm sure, to encapsulate their argument, that they claimed that the seat is NOT a safety device and not intended as a substitute for constant parental or guardian supervision and I'm sure their legal department made sure that this disclaimer was printed somewhere on the product packaging. While this argument may be valid from a purely legal standpoint and prevent the producers from facing a class action lawsuit, it obviously does not reflect the way that many young parents are interpreting the function of the product.

While I'm sure that the product packaging includes a disclaimer (purely for legal defense purposes) that the seat is not a substitute for direct parental supervision, I am willing to bet that the size of the print of this disclaimer is much smaller than that of the words "Safety First" on the package. I believe that this is the biggest problem with the product. This name in and of itself is misleading and could easily give mothers and fathers a false but REASONABLE sense that while their baby is in this seat, the infant will be "SAFE." A more appropriate name would be "Not always Safe-ty First" but I'm afraid merely changing the name of the product to more adequately reflect its true potential harm is not enough. This product needs to be recalled immediately and it's current and future production ceased.

I see now that On July 25, 2000 CFA (The Consumer Federation of America) filed a new petition asking the Consumer Product Safety Commission (CPSC) to ban baby bath seats. I sincerely hope that the CPSC will take an immediate vote on whether or not this product should be banned. I am confident that the CPSC will recognize that this product is unsafe and vote to have it banned from future sale in order to prevent its future contribution to accidental infant deaths. If however, it is once again swayed by the producers of this product into another 2-1 vote to allow it's continued sale, please count the votes of myself, the Consumer Federation of America, The Drowning Prevention Foundation, The Danny Foundation for Crib and Child Product Safety, The Intermountain Injury Control Research Center, The California Coalition for Children's Safety and Health, The California Drowning Prevention Network, The Contra Costa County Childhood Injury Prevention Coalition, Greater Sacramento SAFE KIDS

10/6/00

Coalition, Kids in Danger, U.S. Public Interest Research Organization, Consumers Union, The Good Housekeeping Institute, and my co-worker Beth Vozenilek, who lost her granddaughter Olivia, as additional votes to have this product banned.

Sincerely,

Patrick Lampe

1210 Sierra Dr #10, Cedar Rapids, IA 52402 (319)363-8724

-----Original Message-----

From: Beth Vozenilek [mailto:beth.vozenilek@wcom.com]

Sent: Wednesday, October 04, 2000 11:49 PM

To: BIPPY11@aol.com; Cjdanek@Hotmail. Com; debbie.dilts@wcom.com; Cohenourt@uihc.uiowa.edu; BCOOLEY@kirkwood.cc.ia.us; jan.rike@wcom.com; joyce.whiting@wcom.com; Laura71557@aol.com; NINNYPOOH8@aol.com; Ponyboybarger@Netscape. Net; ray.sitter@wcom.com; dina.rosenblum@wcom.com; kandidon@netins.net; samntoni@tiscalinet.it; sean_morrell@yahoo.com; Stephanie_Turner@rsmi.com; J Tolic; jody.young@wcom.com; PDD_MEL@lists.mci.com; PDD_ANNA@lists.mci.com; linda.kallmeyer@wcom.com; mcowan@erols.com; Williams, Molly; shoey1b@yahoo.com; Kendy.Wazac@wcom.com; Gary.Leopold@wcom.com; kim.oltman@wcom.com; Rick.Talley@wcom.com; Renee.Best@wcom.com; beth.rathbun@wcom.com; rebecca.nosek@wcom.com; Mary2740@aol.com; AllFish@aol.com; wtroutsniffer@aol.com; plaimi@ncs.com

Subject: Petition to ban Baby bath seats

As most of you are aware on June 9, 2000 my 7-month old granddaughter , Olivia Jade Gardner died 24 hours after nearly drowning in a 'Safety First " baby bath seat. I have since learned about and become involved with a movement to ban the bath seats. The following contains information about the movement as well as an action item with a link provided to the address of the CPSC (Consumer Product & Safety Commission) where you can email a letter in support of the ban if you so desire. I would very much appreciate you taking the time to find out more about what is going on with these bath seats and am thanking you ahead of time for your time and support. In 1994 , after 14 infant deaths , an attempt was made to ban these bath seats . CPSC voted against taking any action 2-1. I can't stop thinking that if that 1994 petition had only been successful, Olivia , along with the 51 additional babies that have died since its failure would be alive today.

Here's some information .

On July 25, 2000 CFA (The Consumer Federation of America) filed a new petition asking the Consumer Product Safety Commission (CPSC) to ban baby bath seats. Since the filing many other organizations have joined to support the petition, with more and more organizations concerned with the safety of children joining every day.

Original Petitioners:

Consumer Federation of America

The Drowning Prevention Foundation

The Danny Foundation for Crib and Child Product Safety

The Intermountain Injury Control Research Center

The California Coalition for Children's Safety and Health

The California Drowning Prevention Network

The Contra Costa County Childhood Injury Prevention Coalition

Greater Sacramento SAFE KIDS Coalition

Kids in Danger

Some of the Additional Organizations Supporting the Petition:

U.S. Public Interest Research Organization

Consumers Union

The Good Housekeeping Institute

10/6/00

About The Product: Baby bath seats are intended to assist in bathing infants by holding the infant in a sitting position , upright out of the water ,in a full size bathtub or a sink. When following manufacturers' instructions, they have a useful life developmentally of about 2 months.

The Hazard: There are currently at least 66 known drowning deaths and 37 reports of near drowning. In the first six months of 2000 alone there have been five deaths. In past years there have been an average of 8 deaths per year. Drownings occur when the baby slips out of the seat, the seat tips over, or where the parent is unable to extricate the child from the product after it has tipped over. The product gives parents a false sense of security; they view this product as a safety device, when in fact, it does not perform that way. The bath seat is designed to provide "hands-free bathing " of an infant, but in reality the parent/caregivers hands should never leave the seat. Bath seats are also completely incompatible with bathtubs that meet the voluntary safety standard for bathtubs. Such bathtubs must have a slip resistant feature to prevent falls; bath seat product instructional labeling warns not to use to the product in such bathtubs. CPSC considered this issue in 1994 and decided in a 2-1 vote not to take action. Since that vote, 52 more babies have died and one of the 2 commissioners voting against action has been replaced.

CPSC Comment Period: There is currently a public comment period on the petition seeking input from the public. The deadline for comments to CPSC is October 23, 2000.

ACTION: THIS IS THE MOST IMPORTANT PART , AS THIS IS HOW YOU CAN HELP!!!!!!

The way you can help to make this ban a successful is two-fold.

First of all by sending an email to the Consumer Product Safety Commission in support of the ban . Their address is cpsc-os@cpsc.gov . Emails regarding the ban should contain 'Petition HP 00-4, Petition to Ban Bath Seats' in the subject field.

Below contains a sample / generic type letter. You may compose your own letter , (it's okay if its short and to the point) or you can cut and paste the sample onto your email

. If you use the sample , remember to include your name, address and phone number at the bottom for verification. . Please respond as soon as you can but at least before October 23rd, 2000 as that is the deadline for comments by the public.

Secondly, I would very much appreciate you forwarding this to everyone you know who may be interesting in helping to remove these products from the shelves.

Thank-you & God Bless

Beth Vozenilek
319 375-1229 Work
319 366-6748 Home

SAMPLE LETTER:

October 04, 2000

10/6/00

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

> [name]
> [address]
> [Phone Number]
>

10/6/00

*Bath Seats
Comments*
17

Stevenson, Todd A.

From: Vanina Wolf [vaninaa@umd5.umd.edu]
Sent: Friday, October 06, 2000 2:50 AM
To: cpsc-os@cpsc.gov
Subject: Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

> [name]
> [address]
> [Phone Number]
>

Stevenson, Todd A.

*Bath
seat
18*

From: Celteen Barger [celteen.barger@pmxindustries.com]
Sent: Friday, October 06, 2000 3:57 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

October 04, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Celteen Barger
2238 Chandler St SW
Cedar Rapids, IA 52404
319-363-1316

~~Stevenson, Todd A.~~

Page 1 of 1

Bath Seats
19

From: Frame Anderson [Framerboy@hotmail.com]
Sent: Friday, October 06, 2000 12:24 PM
To: cpsc-os@cpsc.gov
Subject: 'Petition HP 00-4, Petition to Ban Bath Seats'

October 9, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby
Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163,
page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Valerie Anderson

5849 Ridgeview Drive SW
Cedar Rapids, IA 52404
319-390-3067

10/6/00

Stevenson, Todd A.

*bath seats
20*

From: Brenda Cooley [BCOOLEY@kirkwood.cc.ia.us]
Sent: Friday, October 06, 2000 1:23 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

I would like to officially go on record as a citizen who strongly supports the petition to ban baby bath seats from the market. Unfortunately, I know firsthand how dangerous the bath seats are, and how tragic the consequences of using them can be. On June 9th, 2000, my perfectly healthy, precious great-niece (Olivia Jade Gardner) died as a result of nearly drowning 24 hours earlier when her baby bath seat tipped over with her in it. To see such an innocent little life be taken has been a horrifying experience for all who were touched by her, and to find out after the fact the number of other babies who have died as a result of these devices has been shocking.

The deaths of 66 babies should certainly be more than enough to prove any product on the market unsafe for use with infants. Please put a stop to this now. Please vote to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. Thank you for your time.

Brenda Cooley
1518 N Avenue NW
Cedar Rapids IA 52404

Phone (W) 319-398-5448
Phone (H) 319-363-8623

Baby bath seats 21~~Stevenson, Todd A.~~

From: Rachel Rock [rachelrock@mediaone.net]

Sent: Friday, October 06, 2000 10:24 AM

To: cpsc-os@cpsc.gov

Subject: Ban on bath safety seats

October 06, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants

that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Rachel Rock
86 Hawthorn Ave

10/6/00

Needham, MA 02492
781-455-6715

Rachel E. Rock
86 Hawthorn Avenue
Needham, MA 02492
Tel. 617.543.1464
Fax. 781.455.6715 (with prior notification)
Email: rachelrock@mediaone.net

Stevenson, Todd A.

*Letter
marked
22*

From: JJacobi@msiinet.com
Sent: Friday, October 06, 2000 5:58 PM
To: cpsc-os@cpsc.gov
Subject: Ban of Baby Bath Seats

October 6, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,

Jena M. Jacobi
510 Circleview Drive
Atkins, IA 52206
319-446-6066


Stevenson, Todd A.

Handwritten: bath seats 23

From: Carol Danek [cjdane@hotmai.com]
Sent: Saturday, October 07, 2000 1:01 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-4, Petition to Ban Bath Seats

718 Fernwood Drive NE
Cedar Rapids IA 52402
October 07, 2000

Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207

RE: Comments on Petition (HP 00-4) by CFA et. al. seeking a Ban of Baby Bath Seats Federal Register: August 22, 2000 (Volume 65, Number 163, page 50968)

The undersigned citizen strongly urges you to grant the petition of the Consumer Federation of America et. al. to ban baby bath seats. We are alarmed at the high incidence of babies drowning in this product and believe it poses an unreasonable risk of injury and death to children. At least 66 children have died when using this product and an additional 37 were involved in near drownings involving bath seats. Already in the first six months of this year at least five babies have died.

Bath seats have a very short useful life. They are not recommended for use until six months of age, when most infants can sit securely. Once an infant can pull up (generally between seven and nine months) or attempt to stand while holding onto objects, infant bath seats should be discontinued, thus limiting its useful life to approximately two months. Recent research has found that parents and caregivers of infants that use baby bath seats engage in more risk taking behavior than parents and caretakers not using bath seats. Parents and caregivers may see this product as a safety device and thereby have a false sense of security with respect to its use. In addition, bath seats are incompatible with bathtubs meeting the current voluntary standard for bathtub slip resistance. For these reasons and the growing number of drowning deaths, we believe there is substantial evidence supporting a ban of this product.

Please vote to grant the petition of CFA and the other petitioning organizations. Thank you.

Sincerely,
Carol J Danek
718 Fernwood Drive NE
Cedar Rapids IA 52402
319 378-4123

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>.

Share information about yourself, create your own public profile at <http://profiles.msn.com>.


Stevenson, Todd A.

Vote
24

From: Theodore Rodriguez [fourpawd@QuixNet.net]

Sent: Saturday, October 07, 2000 9:34 AM

To: cpsc-os@cpsc.gov

Subject: Petition HP-004, Petition to Ban Bath Seats

Office of Secretary
Consumer Product Safety Commission
Washington D.C. 20207

I am send thing email to voice my conercerns in regards to the safety of infants and their doom to short life while in these Bath Seats.

I find it appalling that it takes so many lives of innocent CHILDREN before something may be done about taking this product off the market.

52 deaths and many more near deaths is way too many to have. This should have been taken off the market as far back as 1994 and I still feel that this is a horror to think that already this year there has been at least 5 deaths related to this product. Not to mention who knows just how many unreported cased there are and have been in past years.

A life is nothing to waste adn at such a young age is even worse.

This product only is able to be used for such a short time that this seems really bad to subject young children and new parents to such a false sense of security and at the same time when some thing like this happens there is no recourse other than puptting the infant to rest and the parents have a life time of only if I would not have used this product that I thought was suppose to help us not hurt us so bad.

Only last thing that I can say is that knowing the horrible mishaps of this product makes me glad that I never had one of these BATH SEATS and both of my children are still alive and healthy.

One item that is suppose to make bath time better and aid in helping an infant for the first two minths of live is nothing more than a death trap and should be off the market long before now. Please take into consideration all the sadness that this product causes and please vote to remove this and others like this off the market once and for all and lower the death rate of infants. This is one way to be able to insure the longer life span of many infnts in this world.

Thank you for your time and please do what it right for the leaders of tomorrow.

Thank you again
Laura A. Rodriguez
10 Cherry Acres Drive
Hampton VA 23669
Phone: 757 723 8633